



DOCKET FILE COPY ORIGINAL

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OCT 21 2013

FCC Mail Room

October 14, 2013

Commission's Secretary  
Office of the Secretary  
Federal Communications Commissions  
445 12<sup>th</sup> St. SW  
Washington, DC, 20554

To whom it may concern:

The attached documents are submitted in order to comply with the reporting requirements outlined by the FCC for Form 481 – Carrier Annual Reporting referenced in WC Docket No 10-90. This filing was also submitted to the USAC via their online filing system and to the Kansas Corporation Commission. An original and one copy of the filing are enclosed.

Please advise if any questions or concerns.

Respectfully,

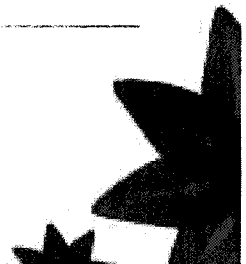
Kent Hoskinson

Wildflower Telecommunications, LLC  
Kent@IdeaTek.biz  
620-543-5006

No. of Copies rec'd 0+1  
LIST ABOVE

PO Box 348 ~ Buhler, KS 67522 ~ 866-844-6381 ~ Fax 866-459-2829

*Local service is our specialty*



**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 419016

<015> Study Area Name WILDFLOWER TELECOMMUNICATIONS, LLC

<020> Program Year 2014

<030> Contact Name: Person USAC should contact with questions about this data Kent Hoskinson

<035> Contact Telephone Number: 620-543-2580 x6008  
Number of the person identified in data line <030>

<039> Contact Email Address: kent@ideatek.biz  
Email of the person identified in data line <030>

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**ANNUAL REPORTING FOR ALL CARRIERS**

54.313 Completion Required	54.422 Completion Required
----------------------------------	----------------------------------

(check box when complete)

<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report			
<300> Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	
<310> Detail on Attempts (voice)	<input type="text"/>	<input checked="" type="checkbox"/>	
<320> Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	
<330> Detail on Attempts (broadband)	<input type="text"/>	<input checked="" type="checkbox"/>	
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	
<410> Fixed	<input type="text" value="0.0"/>		
<420> Mobile	<input type="text" value="0.0"/>		
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	
<440> Fixed	<input type="text" value="0.0"/>		
<450> Mobile	<input type="text" value="0.0"/>		
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	
<510> <input type="text" value="419016ks510"/>	(attached descriptive document)	<input checked="" type="checkbox"/>	
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	
<610> <input type="text" value="419016ks610"/>	(attached descriptive document)	<input checked="" type="checkbox"/>	
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input type="checkbox"/>	
<1010> <input type="text"/>	(attach descriptive document)	<input type="checkbox"/>	
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**  
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	
<2005>	(complete attached worksheet)	<input type="checkbox"/>	

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input type="checkbox"/>	
<3005>	(complete attached worksheet)	<input type="checkbox"/>	

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

419016

WIDEFLOWER TELECOMMUNICATIONS, LLC

&lt;010&gt; Study Area Code

&lt;015&gt; Study Area Name

&lt;020&gt; Program Year

2014

&lt;030&gt; Contact Name - Person USAC should contact regarding this data

Kent Hoskinson

&lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt;

620-543-2580 x6008

&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt;

kent@ideatek.biz

&lt;110&gt; Has your company received its ETC certification from the FCC?

(yes / no )



&lt;111&gt; If your answer to line &lt;110&gt; is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?

(yes / no )



If your answer to line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

419016ks112

Name of Attached Document (.pdf)

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets  
 <114> Report how much universal service (USF) support was received  
 <115> How (USF) was used to improve service quality  
 <116> How (USF) was used to improve service coverage  
 <117> How (USF) was used to improve service capacity  
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

WILDFLOWER TELECOMMUNICATIONS, LLC

WILDFLOWER TELECOMMUNICATIONS, LLC

Kent Hoskinson

Kent Hoskinson

**<039> Contact Email Address - Email Address of person identified in data line <030> kent@ideatek.biz**

**<039> Contact Email Address - Email Address of person identified in data line <030> kent@ideatek.biz**

-- See attached worksheet --

Study Area Code
<010>

Study Area Name
<015>

[illegible]

<030> Contact Name - Person USAC should contact regarding this data

<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580	x6008
<039>	Contact Fmail Address - Fmail Address of person identified in data line <030>	kenct@eastek.biz	

<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz

1/1/2013

**<702> Single State-wide Residential Local Service Charge**

Page 4

<010>	Study Area Code	419016
<015>	Study Area Name	WILDFLOWER TELECOMMUNICATIONS, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz

[illegible]

<010>	Study Area Code	439016
<015>	Study Area Name	WILDFLOWER TELECOMMUNICATIONS, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2560 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz
<810>	Reporting Carrier	Wildflower Telecommunications, LLC
<811>	Holding Company	Ideatek Systems, Inc
<812>	Operating Company	Wildflower Telecommunications, LLC

<813>	<81>	<82>	<83>
Affiliates	SAC	Doing Business As Company or Brand Designation	

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0936/OMB Control No. 3060-0819  
July 2012

<010>	Study Area Code	419016
<015>	Study Area Name	WILDFLOWER TELECOMMUNICATIONS, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@dataetek.biz
<910>	Tribal Land(s) on which ETC Serves	

<920> Tribal Government Engagement Obligation

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Name of Attached Document (.pdf)

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select (Yes, No, NA)	



(1100) No Terrestrial Backhaul Reporting  
Data Collection Form

HCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	419016
<015>	Study Area Name	WIDELOWER TELECOMMUNICATIONS, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@deatek.biz

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

☒

**(1200) Terms and Condition for Lifeline Customers**  
**Lifeline**  
**Data Collection Form**

PEC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2012

<010>	Study Area Code	419016
<015>	Study Area Name	WILDFLOWER TELECOMMUNICATIONS, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☐

<1222> Details on the number of minutes provided as part of the plan, ☐

<1223> Additional charges for toll calls, and rates for each such plan. ☐



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<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(b)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.333(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

## Progress Report on 5 Year Plan

	Name of Attached Document Listing Required Information	<input type="checkbox"/>
(3010)	Milestone Certification (47 CFR § 54.313(f)(1)(i)) Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(ii), as a recipient of CAC Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
(3011)		
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(2)(ii))	<input type="checkbox"/>
(3013)	Is your company a Privately Held ROR Carter (47 CFR § 54.313(f)(2))	<input type="checkbox"/> (Yes/No)
(3014)	If yes, does your company file the RUS annual report Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:	<input type="checkbox"/> (Yes/No)
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<input type="checkbox"/>
(3018)	If the response is no on line 3014, Is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains :	<input type="checkbox"/> (Yes/No)
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input type="checkbox"/>
(3020)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
(3025)	PDF of Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	<input type="checkbox"/>

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	419016
<015>	Study Area Name	WILDFLOWER TELECOMMUNICATIONS, LLC
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Kent Hoskinson
<035>	Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039>	Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: WILDFLOWER TELECOMMUNICATIONS, LLC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 10/14/2013
Printed name of Authorized Officer: Daniel Friesen	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 620-543-2580	
Study Area Code of Reporting Carrier: 419016	Filing Due Date for this form: 10/15/2013
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0985/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	419016
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<035> Contact Telephone Number - Number of person identified in data line <030>	620-543-2580 x6008
<039> Contact Email Address - Email Address of person identified in data line <030>	kent@ideatek.biz

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

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Attachments

419016

WILDFLOWER TELECOMMUNICATIONS, LLC

2014

Robert Hoskinson

620-543-2580 x6008

kent@ideatek.biz

Wildflower Telecommunications, LLC

**Ideatek Systems, Inc**

Wildflower Telecommunications, LLC

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## Doing Business As Company or Brand Designation

## Doing Business As

# Doing Business As



**WILDFLOWER TELECOMMUNICATIONS, LLC**

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**October 10, 2013**

**FCC Mail Room**

**Accompanying Statement of Wildflower Telecommunicaitons, LLC five-year service quality improvement plan pursuant to 54.202(a)**

**Line 112: Five-year service quality improvement plan**

Wildflower Telecommunications, LLC is a Kansas CLEC in the process of deploying services to rural Kansas towns with populations of 750 to 1500 residents. The typical deployment is to a rural town served by a non-rural ILEC with no CLEC competition. Our current 5 year deployment plan focuses on rural area primarily in SouthCentral Kansas. In 2012 our rollout included the cities of Mt. Hope and Yoder, Kansas. Attached map details our current and planned deployment areas.

In 2012 \$48,879 FUSF High cost funds were received that were applied to our service quality improvement efforts detailed below. No KUSF funds were received.

The enhancement and maintenance of our service quality were achieved by a substantial investment to maintain our existing fiber optic network, telephone switch, and outside plant.

A capital investment was made in the purchase and installation of a new telephone switch that more than tripled our service capacity.

A capital investment expanded our service coverage through the addition of local loops and between city trunks.

In general, deployment is proceeding as planned but our Mt. Hope deployment has taken longer than anticipated due to a higher than expected market penetration rate and cost overruns associated with underground fiber optic plant build.

**WILDFLOWER TELECOMMUNICATIONS, LLC**

**October 10, 2013**

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**Accompanying Statement of Compliance of Requirements in FCC Form 481**  
**Instructions**

***Line 510: Service Quality Standards and Consumer Protection Rules Compliance***  
***Policies of Wildflower Telecommunications, LLC***

The following summary describes the policies of Wildflower Telecommunications, LLC ("Company") that are designed establish Service Quality Standards, to protect the confidentiality of Customer Proprietary Network Information ("CPNI"), and to assure compliance with the rules of the Federal Communications Commission ("FCC") set forth in 47 C.F.R. Part 64, Subpart U, Section 2001 et seq. CPNI is "(A) information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier."

- I. USE, DISCLOSURE OF, AND ACCESS TO CPNI
  - a. **The Company does not utilize CPNI for marketing purposes and the Company's personnel have been trained not to utilize CPNI for such purposes.**
  - b. Supervisors are trained to ensure all employees involved with CPNI data are trained on company policy regarding the use of CPNI. Current policy requires supervisors to deny all requests for CPNI use for marketing purposes.
  - c. Unless otherwise permitted by law, the Company prohibits the release of CPNI to any third party without an appropriate subpoena and approval from company's legal counsel.
  - d. Company may use, disclose, or permit access to CPNI only in its provision of the communications service from which such information is derived:
    - i. for services necessary to, or used in, the provision of such

communications service; to initiate, render, bill and collect for communications services;

ii. to protect the rights or property of the Company, or to protect users or other carriers or service providers from fraudulent, abusive or unlawful use of, or subscription to, such services;

iii. to provide inside wiring installation, maintenance, or repair services;

iv. as required by law;

v. or as expressly authorized by the customer.

e. Company does not use, disclose or permit access to CPNI to identify or track customers that call competing service providers.

## II. SAFEGUARDS AGAINST DISCLOSURE OF CPNI TO UNAUTHORIZED PARTIES

a. Company policy allows the company to provide CPNI to the customer of record of such CPNI only when the customer has fulfilled a stringent verification process by verifying information such as a password, last month's statement amount, PIN, Tax ID, or other means of sufficient personal identification that is not readily available biographical information, or account information.

b. The Company does not currently provide any CPNI information via the Internet. If the Company does begin the offering of such data, the data will be encrypted and only be available to the customer of record and only after fulfilling specific security verification as required by law including providing a password that does not contain readily available biographical information, or account information.

c. Company Policy provides that walk-in requests for CPNI data will only be provided to the customer of record and only after the customer properly identifies themselves with a valid photo ID.

d. Only CPNI policy-trained employees are allowed to access CPNI or disclose CPNI information to the customer of record.

## III. REPORTING CPNI BREACHES TO LAW ENFORCEMENT

a. A "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI. As soon as practicable, and in no event later than seven (7) business days upon learning of a breach, the Company shall

electronically notify the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI) by accessing the following link: <https://www.cpnireporting.gov>. Company will not notify customers or disclose a breach to the public until 7 full business days have passed after notification to the USSS and the FBI except as provided below. If Company receives no response from law enforcement after the 7th full business day, it must promptly proceed to inform the customers whose CPNI was disclosed of the breach. Company will delay notification to customers or the public upon request of the FBI or USSS.

#### IV. RECORD RETENTION

- a. Company requires all CPNI access be documented in the customer's account and that these documentations be retained for a minimum of two years.
- b. Company maintains for at least two years a record of any breaches discovered, notifications made to the USSS and the FBI pursuant to these procedures, and notifications of breaches made to customers. The record must include, if available, dates of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach.
- c. Company maintains a record, for a period of at least one year, of those limited circumstances in which CPNI is disclosed or provided to third parties.
- d. Company maintains a record of all customer complaints related to its handling of CPNI, and records of Company's handling of such complaints, for at least two years. Any complaints would be reported and reviewed to determine whether any changes to this policy are appropriate and to address the concerns raised by such complaints.

**WILDFLOWER TELECOMMUNICATIONS, LLC**

**October 10, 2013**

Received & Inspected  
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**Accompanying Statement of Compliance of Requirements in FCC Form 481**  
**Instructions**

***Line 610: Functionality in Emergency Situations***

Wildflower Telecommunications, LLC certifies that it has a reasonable amount of backup power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

Wildflower Telecommunications, LLC's Network Operation Center (NOC) is protected from power outages via a power fail over process made up of a 20 kw power generator fueled by either natural gas or lp gas, multiple battery backup units, and a fail over switch. The process is capable of powering the NOC for an indefinite amount of time. The process is load tested on a weekly basis. The switch to generator power is transparent to network subscribers.

The Wildflower Telecommunications, LLC fiber optic network is engineered using a ring topology that facilitates rerouting of traffic in the event of damage.

Bandwidth provided by Wildflower's fiber optic network will handle voice traffic spikes. Voice switching technology employed is capable of handling three times the current average concurrent traffic load.